

## REMARKS

Reconsideration of the application is respectfully requested for the following reasons:

1. Formalities

The specification and claims have been amended to place the application in proper U.S. format and correct various minor grammatical and idiomatic errors. Because the changes are all formal in nature, it is respectfully submitted that they do not involve “new matter.”

2. Rejection of Claims 1-6 Under 35 USC §102(e) in view of U.S. Patent No. 6,446,113 (Ozzie)

This rejection is respectfully traversed on the grounds that the Ozzie patent fails to disclose or suggest a method of synchronously updating screen data of a database application program at a plurality of clients by:

- installing a reference table at a server on a network;
- enabling a client to read the reference table when updating data; and
- causing the client to transmit the updated data to other clients by utilizing filenames included in the reference table.

The reference table of the claimed method enables one client to determine the names of other client's files containing corresponding records, thereby enabling the records of the other clients to be synchronously updated by any client during update of data on the server.

In contrast, the Ozzie patent teaches the inclusion, in each client computer on a network, or a “data-change engine” for handling collaborative peer-to-peer computer interactions, including making requested changes to locally stored data. **Each** client has its own engine that handles changes on that computer, and each “engine” essentially comprises a communications socket that is provided between the application and the network interface of the respective computers. **The Ozzie method does not simply provide a reference table on a database server, as claimed, but rather requires a data-change “engine” on each computer, and the exchange of command packets called “deltas” which are executed by the engines on each computer.**

On page 2 of the Official Action, the Examiner states that the claimed “reference table” corresponds to items 316 and 320 shown in fig. 3 of the Ozzie patent. Element 316, and table 320, actually have **nothing** to do with the claimed reference table. **Element 316 is simply a “store and forward” device or relay, “which can store messages destined to a peer unit 314 which is temporarily disconnected from the Internet, and later, on reconnection, can forward the messages to that peer unit (col. 10, lines 16-22). Look-up table 320 merely stores URLs so that the relay unit can forward “deltas” to the various peer units upon reconnection. Neither relay 316 nor look-up table 320 of Ozzie stores filenames for use by a client that has sent updated data to a server and now wishes to update corresponding records in the files of other clients, as claimed.**

According to the claimed invention, whenever a client accesses the server to update data, it can refer to the reference table and thereby obtain the addresses and filenames necessary to send the updated data directly to the database application programs of other clients. The Ozzie patent does not disclose any such reference table for supplying filenames when a database server is being accessed to update data. Certainly, relay 316 and look-up table 320 do not perform the function of supplying filenames, and neither is invoked when a client updates data on a server. Neither the updating client nor the other clients serviced by the claimed method requires a “data-change engine,” arranged to execute deltas or command packets, as in the Ozzie system.

The purpose of the invention is to eliminate the need for each client to access the server in order obtain updated data. This is made possible because the updating client does not merely send updated data to the server, but also sends the updated data directly to the other clients. In a conventional intranet (and in the system of Ozzie), each client maintains its own file system and there is no way for one client to know whether another client’s files include corresponding records, or to know the names of the files. By maintaining a table at the server, the claimed method keeps tracks of which clients maintain which records, and the filenames of the corresponding files, thereby making possible the synchronous updating of other client files by the one client that is updating the data. The Ozzie patent discloses an entirely different type of

system, in which command packets are broadcast to and executed by special data-change engines on each participating computer. While the system of Ozzie includes a URL-storing relay, the URL-storing relay is not a look-up table at a server, as claimed, and does not provide filenames when a client sends updated data to the server.

Because the Ozzie patent neither discloses nor suggests the claimed server reference table accessed when data is being updated by a client, the table providing filenames utilized by the client in sending the updated data to other clients, it is respectfully submitted that rejection of claims 1-6 under 35 USC §102(e) is improper and withdrawal of the rejection is respectfully requested.

3. Rejection of Claims 1 and 7-9 Under 35 USC §102(e) in view of U.S. Patent No. 6,654,748 (Rabung)

This rejection is respectfully traversed on the grounds that the Rabung patent, like the Ozzie patent, fails to disclose or suggest a method of synchronously updating screen data of a database application program at a plurality of clients installing a reference table at a server on a network; enabling a client to read the reference table when updating data; and causing the client to transmit the updated data to other clients by utilizing filenames included in the reference table, as claimed.

Instead, the Rabung patent discloses a client-based browser having a database manager for controlling access to the database. This differs from the claimed invention in a variety of ways, including:

- The claimed reference table is located **at the server** rather than in a client browser, as in Rabung
- The claimed reference table is accessible by **all** clients accessing the database, rather than being tied to a single client and server;
- The claimed reference table supplies **filenames of other clients**, as opposed to names and attributes of objects stored in the central server database.

According to the Examiner, col. 4, lines 7-13 of the Rabung patent teaches the claimed reference table. The cited passage teaches nothing of the sort. Instead, it merely teaches that Java implementations are divided into files. The files in question are not files of other client computers containing records that need to be updated as indicated by a reference table at the server, but rather parts of a database manager on a single client, which are used to enable access to the database at the server.

Also according to the Examiner, col. 6, lines 7-13 of Rabung teach including filenames of other clients in the reference table. Again, the cited passage teaches nothing of the sort. Instead, it merely teaches a table of physical filenames corresponding to the symbolic file names used to organize the database. The filenames are not stored in the files referred to in col. 4, lines 7-13, and are not accessed by a client in order to send data to other clients upon updating the server's database.

Finally, according to the Examiner, col. 8, lines 33-57 of Rabung teaches the claimed client to client data updates. This passage mentions only updating of the network computer, and does not mention any sort of client-to-client update. For example, according to the Examiner, col. 8, lines 33-48 teach “*when one of the clients updates data of the database at the server, enabling the client to read the reference table for identifying the filenames of the databases opened by the other clients*” (page 5 of the Official Action) whereas the passage in question actually reads:

*If, however, update support is enabled, a login prompt is created and displayed to a user of the local .terminal in step 342. In step 344 the user enters a user name and password, for example, which is then stored in a file at step 346. A status panel is displayed to the user in step 348 to inform the user of the status of the update procedure and also to prevent the user from thinking that the system has stopped operating properly due to the potential delay caused by the update module.*

This passage does not mention reading of a reference table for identifying the filenames of the databases opened by the **other** clients, and in fact does not mention **other** clients at all, much less

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the filenames of databases opened by other clients, or use of the filenames to update the other clients in addition to the client's database at the server. Nowhere does Rabung include any such teachings.

The Examiner will note that the purpose of the claimed invention is to reduce the load on the database server by having client computers carry out some of the functions that would otherwise require server access. The Rabung patent, in contrast, requires extensive interaction between a client and server, and yet does not enable one client to update another's files. As a result, it is respectfully submitted that the rejection of claims 1 and 7-9 under 35 USC §102(e) is improper and withdrawal of the rejection is respectfully requested.

Having thus overcome each of the rejections made in the Official Action, expedited passage of the application to issue is requested.

Respectfully submitted,

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